

11

UNITED STATES DISTRICT COURT

for the
Eastern Michigan District of __________
Division

Asia Scott

Case: 2:23-cv-12814

Assigned To : Berg, Terrence G.

Referral Judge: Altman, Kimberly G.

Assign. Date : 11/6/2023

Description: CMP SCOTT V.

RADIUS GLOBAL SOLUTIONS ET AL (DJ)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

-v-

Radius Global Solutions, Source
Receivables Management, and
Central Portfolio Control

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Asia Scott
Street Address	17943 OAKWOOD BLVD
City and County	DEARBORN, Wayne
State and Zip Code	Michigan, 48124
Telephone Number	313-778-0914
E-mail Address	Hill22309@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

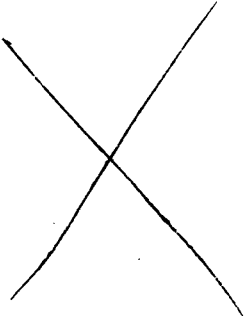
Defendant No. 1

Name	Radius Global Solutions
Job or Title <i>(if known)</i>	
Street Address	450 VETERANS MEMORIAL PARKWAY,
City and County	EAST PROVIDENCE
State and Zip Code	RI 02914
Telephone Number	(888) 287-5711
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Source Receivables Management
Job or Title <i>(if known)</i>	
Street Address	4615 Dundas Dr Ste 102
City and County	Greensboro
State and Zip Code	North Carolina , 27407
Telephone Number	(877) 251-3792
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Central Portfolio Control
Job or Title <i>(if known)</i>	
Street Address	10249 Yellow Circle Drive #200
City and County	Minnetonka
State and Zip Code	MN 55343
Telephone Number	(800) 541-7123
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 U.S.C 1692

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Asia Scott, is a citizen of the
State of *(name)* Michigan.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of
the State of *(name)*. Or is a citizen of
(foreign nation).

b. If the defendant is a corporation

The defendant, *(name)* Radius Global Solutions, is incorporated under the laws of the State of *(name)* Rhode Island, and has its principal place of business in the State of *(name)* Washinton.
Or is incorporated under the laws of *(foreign nation)*, and has its principal place of business in *(name)*.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$50,000 plaintiff was denied work and credit due to the reporting of defendant

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

plaintiff call each defendant regarding th accounts being furnished by their company and dispute the accounts but defendant failed to mark the account dipsute when plaintiff check her consumer profile after updating.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

plaintiff askes for judgment judgment be entered in favor of Plaintiff and against the Debt Collector for :A. Judgment for the violations occurred for violating the FDCPA;

B. Actual damages pursuant to 15 U.S.C 1692k(l)(2);

C. Statutory damages pursuant to 15 U.S.C 1692k(2);

D. Cost and pursuant to 15 U.S.C 1692k(3); E. For a deletion and further relief as the Court may deem just and proper.

E. For a deletion and further relief as the Court may deem just and proper.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF EASTERN MICHIGAN**

Asia Scott)	JURY TRIAL DEMANDED
Plaintiff,)	
)	
V.)	
)	Case No.
)	
Radius Global Solutions,)	
Source Receivables Management,)	
And Central Portfolio Control)	
Defendant.)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is a civil action for actual, statutory damages, and costs brought by Asia Scott ("Plaintiff") an individual consumer, against Defendants, Radius Global Solutions ("RGS"), Source Receivables Management ("SRM"), and Central Portfolio Control ("CPC") for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 et seq. (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d).
3. Jurisdiction of this court also arises 28 U.S.C § 1331.
4. Venue in this District is proper because Defendant regularly transacts business in the State of Michigan and in this judicial district.
5. 28 U.S.C. § 1391(b)(1) provides, in pertinent part, that "[a] civil action may be brought in a judicial district in which any Defendants resides[.]"
6. 28 U.S.C. § 1391(c)(2) provides in pertinent part, "For all venue purposes—an entity with the capacity to sue and be sued in its common name under applicable law, whether or

not incorporated, shall be deemed to reside, if a Defendants, in any judicial district which such Defendants are subject to the court's personal jurisdiction[.]"

7. Venue is proper in this judicial under 28 U.S.C. § 1391 (b)(1).

III. PARTIES

8. Plaintiff Asia Scott (hereinafter "Ms. Scott ") is a natural person residing in Wayne, Dearborn County, Michigan. Ms. Scott is; a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
9. Asia Scott is allegedly obligated to pay an obligation to pay money arising out of a transaction in which the money, property, insurance, or services that are the subject of the transaction are primarily for personal, family, or household purposes. Ms. Scott is allegedly obligated to pay a "Debt" as defined by 15 U.S.C. §1692a(5).
10. Upon information and belief. Defendant, RGS is a Minnesota corporation with its principal place of business located at 7831 Glenroy Road Suite 250.
11. Defendant, Radius Global Solutions, is engaged in the collection of debt from consumers using mail and telephone. Defendants 'f regularly attempt to collect consumers' debts alleged to be due to other companies.
12. Upon information and belief. Defendant, Source Receivables Management is a North Carolina corporation with its principal place of business located at 4615 Dundas Dr Ste 102 Greensboro.
13. Defendant, Source Receivables Management., is engaged in the collection of debt from consumers using mail and telephone. Defendants 'f regularly attempt to collect consumers' debts alleged to be due to other companies.
14. Upon information and belief. Defendant, Central Portfolio Control. is a Minnesota corporation with its principal place of business located at 10249 Yellow Circle Drive, Suite 200, Minnetonka, Minnesota.
15. Defendant, Central Portfolio Control., is engaged in the collection of debt from consumers using mail and telephone. Defendants 'f regularly attempt to collect consumers' debts alleged to be due to other companies.

IV. FACTS OF THE COMPLAINT

16. Defendant, central portfolio control, (hereinafter referred to as "Debt Collector") is a "debt collector" as defined by the FDCPA, 15 U.S.C § 1692a(6).
17. On or about June 30, 2023, Ms. Scott reviewed her credit report with "Experian."
18. On the report, Ms. Scott observed trade lines from all the Debt Collector Defendants.
19. Debt Collector Central Portfolio Control, furnished a trade line of \$931, allegedly owed to Emerg Prof Of Michigan PC.
20. Debt Collector Radius Global Solutions LLC furnished a trade line of \$361, allegedly owed to DTE ENERG.
21. Debt Collector Source Receivables Management Furnished a trade line of \$3,169, allegedly owed to Sprint.
22. Around July 2023, Ms. Scott disputed via telephone about the accounts in question. However, in August 2023, Mr. Scott re-checked her credit reports, and although the Debt Collectors had several communications with the consumer reporting agencies, the Debt Collectors failed to communicate the alleged debts in question were disputed; by Ms. Scott.
23. The Debt Collector's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Ms. Scott and caused severe humiliation, emotional distress, mental anguish, and FICO scores.
24. Defendant materially lowered Plaintiff's credit score by failing to note Ms. Scott's dispute.
25. A debt reported without dispute results in a much lower credit score than a report of both the debt and the dispute. Saunders v. Branch Banking and Trust Co. of VA, 526 F. 3d 142, 146-47 (4th Cir. 2008).

FIRST CLAIM FOR RELIEF

(Defendants Radius Global Solutions, Source Receivables Management And Central Portfolio Control) 15 U.S.C. §1692e(8)

26. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
27. The Debt Collectors violated the FDCPA.
28. The Debt Collectors' violations include but are not limited to, the following :
29. The Debt Collector violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies the alleged debt was in dispute.
30. As a result of the above violations of the FDCPA, the Defendants are liable for Ms. Jackson's actual damages, statutory damages, and cost.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Ms. Jackson respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for :

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(l)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2);
- D. Cost and pursuant to 15 U.S.C 1692k(3); E. For a deletion and further relief as the Court may deem just and proper.
- E. For a deletion and further relief as the Court may deem just and proper.

Respectfully submitted:

Asia Scott
17943 OAKWOOD BLVD
DEARBORN, MI 48124-5024
Hil22309@gmail.com

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Asia SCOTT

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PL.)

(c) Attorneys (Firm Name, Address, and Telep

DEFENDANTS

Radius Global Solution, Source Receivable Management
and Central Portfolio Control

County of Residence of First Listed Defendant

PLAINTIFF CASES ONLY)

IN CASES, USE THE LOCATION OF
INVOLVED.Case: 2:23-cv-12814
Assigned To: Berg, Terrence G.
Referral Judge: Altman, Kimberly G.
Assign. Date: 11/6/2023
Description: CMP SCOTT V.
RADIUS GLOBAL SOLUTIONS ET AL (DJ)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander		<input type="checkbox"/> 440 State Reapportionment	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle		<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 850 Securities/Commodities Exchange
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice		<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	IMMIGRATION
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 462 Naturalization Application
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 720 Labor Management Relations	<input type="checkbox"/> 465 Other Immigration Actions
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 751 Family and Medical Leave Act	
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 790 Other Labor Litigation	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Employee Retirement Income Security Act	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
1692
Brief description of cause:
violation of the FDCPA

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
\$5,000CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Asia Scott
17943 OAKWOOD BLVD
DEARBORN MI 48124-5024

\$5.46 US POSTAGE
FIRST-CLASS
Oct 31 2023
Mailed from ZIP 48124
1 OZ FIRST-CLASS MAIL LETTER
RATE
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USPS CERTIFIED MAIL



9407 1118 9876 5494 1599 18

United States District Court for the Eastern D
Theodore Levin U.S. Courthouse
231 W LAFAYETTE BLVD STE 901 RM 599
DETROIT MI 48226-2794

